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ARIZONA CORPORATION COMMISSION

April 18, 2014

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Mr. John Foreman
Assistant Arizona Attorney General
Office of the Attorney General
1275 West Washington Street
Phoenix, Arizona 85007-2926

Arizona Corporation Commission

DOCKETED

APR 18 2014

ORIGINAL

DOCKETED BY

A handwritten signature in black ink, appearing to be "J. Foreman", written over a rectangular box.

RE: SUN STREAMS, LLC GEN-TIE LINE SITING #168 - APPLICATION FOR CEC
DOCKET NO. L-00000XX-14-0120-00168

Dear Chairman Foreman:

On April 8, 2014 you sent a letter concerning the Sun Streams, LLC ("Sun Streams") application for the issuance of a Certificate of Environmental Compatibility ("CEC") for a 500 kV generation tie line and associated 34.5 kV/500 kV substation facilities (collectively, "Gen-tie") in Maricopa County ("Application"). The Gen-tie will deliver electrical power from Sun Stream's proposed 150 MW photovoltaic solar generating facility located approximately 0.3 mile east of the Hassayampa Switchyard. This letter is the Utilities Division's response to that letter addressing the question of whether the proposed project improves the reliability or safety of the operation of the grid.

Sun Streams filed the system impact study completed for interconnection of the Gen-tie with its Ten Year Transmission Plan filing in Docket No. E-00000D-13-0002. The study was completed by WHenergy Consulting, Inc. in October 2011. The system impact study appears to have been properly completed, with evaluations made against North American Electric Reliability Corporation and Western Electricity Coordinating Council reliability criteria. The study identifies the impact on the existing transmission system of interconnecting and delivering energy from the Sun Streams facility. Based upon the study results, it was found that there were no system upgrades required as a result of interconnecting the Gen-tie and its associated solar generation to the transmission system.

The 500 kV line is a short radial generation interconnection of approximately 0.3 mile and therefore provides no network transmission benefits. It should not affect the reliability or safety of operation of the grid when connected in compliance with its generation interconnection agreement, provided it is operated according to good utility practice and in accordance with any applicable reliability standards.

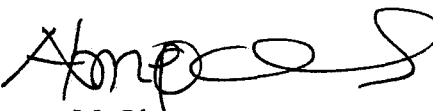
In addition, based upon information provided on the proposed facilities being located adjacent to an existing natural gas pipeline. The Utilities Division recommends inclusion of the standard cathodic study condition to evaluate the risk to any existing natural gas or hazardous liquid pipelines as follows:

When project facilities are located parallel to and within 100 feet of any existing natural gas or hazardous liquid pipeline, Applicant shall:

- (a) Ensure grounding and cathodic protection measurements are performed to show that the project's location parallel to and within 100 feet of such pipeline results in no material adverse impacts to the pipeline or to public safety when both the pipeline and the project are in operation. Applicant shall take appropriate steps to ensure that any material adverse impacts are mitigated. Applicant shall provide to Commission Staff and file with Docket Control a copy of the measurements performed and additional mitigation, if any, that was implemented as part of its annual compliance-certification letter; and
- (b) Ensure that measurements are taken during an outage simulation of the project that may be caused by the collocation of the project parallel to and within 100 feet of the existing natural gas or hazardous liquid pipeline. The measurements should either: i) show that such simulated outage does not result in customer outages; or ii) include operating plans to minimize any resulting customer outages. Applicant shall provide a copy of the measurement results to Commission Staff and file it with Docket Control as part of its annual compliance-certification letter."

If you have any questions, please feel free to contact me, at (602) 542-7270 or Ed Stoneburg at (602) 542-0755.

Sincerely,

for 

Steven M. Otea
Director
Utilities Division

SMO:ES:tdp